

1 Put in the opposite way, under BellSouth's proposed cost structure, it is currently over-
2 recovering 400% of its actual costs in performing UNE-P to UNE-L conversion on **over 62% of**
3 **all UNE-L loops statewide.**

4
5
6 **Q. HAS SUPRA PREPARED COST STUDIES DOCUMENTING COST GROUPS 2 –**
7 **6 AS WELL?**

8 A. Attached to this testimony, Supra files cost studies for Groups 2 through 5 (Supra Exhibit
9 # DAN-46 *Confidential* - Supra Group 2 Cost Study - IDLC served UNE-P to Copper UDLC
10 UNE-L Cost Study FL-2w.xls. Dated 10/08/2004, Supra Exhibit # DAN-47 *Confidential* -
11 Supra Group 3 Cost Study – NGDLC UNE-P to NGDLC Virtual Terminal UNE-L Cost Study
12 FL-2w.xls. Dated 10/08/2004 , Supra Exhibit # DAN-48 *Confidential* - Supra Group 4 Cost
13 Study – INA or other DCS served IDLC UNE-P to UNE-L Cost Study FL-2w.xls. (Similar to
14 Group 3 Supra Exhibit # DAN-47) Dated 10/08/2004 , Supra Exhibit # DAN-49 *Confidential* -
15 Supra Group 5 Cost Study –IDLC UNE-P to Switch Side Dorr UNE-L Cost Study FL-2w.xls.
16 (Similar to Group 3 Supra Exhibit # DAN-47) Dated 10/08/2004.

17 Supra is not filing accost study for group 6 because correct or incorrect, this commission
18 has already ruled upon the costs for this type of service in Docket 990649-TP, and Bellsouth has
19 implemented this according to its 11/22/2000 - BellSouth UNE-P Loop Concentration document
20 for CLECs "Unbundled Loop Concentration CLEC Information Package", Version 1 (Supra
21 Exhibit # DAN-51) attached. The only statement of material fact in dispute is whether BellSouth
22 may legally restrict the Deployment of the loop concentration UNE in **central offices**, and
23 restrict its availability in remote terminals, and whether BellSouth may continue, legally, to

1 refuse to connect BellSouth subloops to this system. Currently BellSouth position is that only
2 CLEC owned loops may be connected to this UNE, as hard as that is to believe, particularly
3 because they state it is only available within the CO.

4 However this limitation is not evident in this Commissions orders in 990649-TP, nor does
5 it make sense from a technical feasibility, or a legal standpoint. Once these two threshold issues
6 are resolved, resolved, existing costs will be used for Group 6 conversions
7 .

8 **Q. WHAT SPECIFIC CHANGES WERE MADE TO THE BELL SOUTH COST**
9 **STUDY TO CREATE THE GROUP 3 COST STUDY FOR UNE-P IDLC LOOPS**
10 **WHICH MUST BE CONVERTED TO COPPER OR UDLC?**

11 A. Again, all worktimes were reset to Bellsouth figures unless otherwise detailed below, and
12 the adjustments affected through the probability factors.

13

14

15

16

17

18

19

20

21

22

23

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]

1 [REDACTED]
2 [REDACTED]
3
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9

10 **Q. WHAT RATE DOES THE SUPRA COST STUDY INDICATE FOR A UNE-P TO**
11 **UNE-L CONVERSION WHERE THE UNE-P LOOP IS SERVED BY IDLC**
12 **BEFORE AND COPPER OR UDLC AFTER CONVERSION?**

13 Based upon Mr. Ainsworths deposition and the Supra cost study modified as stated above,
14 \$59.62 install / \$0.7606 disconnect for SL1, and \$62.81 / \$0.7606 for SL2.⁷⁹ We have still been
15 unable to depose anyone who can testify as to the exact worktimes in the CO forces⁸⁰ with
16 specificity, much less to resolve the difference between Mr. Ainsworth's testimony that the
17 Central Office Forces take just 2:39 to actually perform a hot cut, BellSouths attempt to recover
18 15/20 mins for this activity, and new Bellsouth discovery which indicates they now seek 21/???
19 Minutes for this activity. Resolving this will have a noticeable effect on the final cost as
20 discussed above for the Group 1 cost study.
21

⁷⁹ A.1.1, \$.70 for A.1.2. See Supra Exhibit # DAN-46 *Confidential* - Supra Group 2 Cost Study - IDLC served UNE-P to Copper UDLC UNE-L Cost Study FL-2w.xls. Dated 10/08/2004

⁸⁰ Or any other department.

1 **Q. IS SUPRA SEEKING A SINGLE RATE FOR ALL FORMS OF IDLC**

2 **CONVERSION BASED UPON MR. AINSWORTH'S LIMITED TESTIMONY?**

3 A. No. The reason why Supra is not "seizing this opportunity" to capitalize on BellSouth's
4 omission is quite simple; It would cost Supra money. BellSouth has not filed IDLC conversion
5 cost studies because if it did, it would indicate an extremely low cost as compared to a copper /
6 UDLC conversion. Bellsouth has deliberately not filed IDLC conversion cost studies because
7 BellSouth would be forced to bill CLECs less than it does today.

8

9 **Q. HOW IS THAT POSSIBLE?**

10 A. Because Bellsouth does not have to use archaic and obsolete processes to convert much
11 of its IDLC served loops to CLEC switches. In his deposition testimony, Mr. Ainsworth
12 admitted that for Alternative 2, the NGDLC served loop, no manual process by any human being
13 is required to convert the loop from the BellSouth switch See Ainsworth Sept. 21, 2004 depo.
14 Tr., pg. 125-26. However this requires certain non-efficient, old-fashioned constraints are
15 removed from the process

16

17 **Q. WHAT CHANGES IS SUPRA SEEKING?**

18 A. BellSouth Alternative 2 and 4⁸¹ convert the loop to digital form in the outside plant, and
19 carry the call all the way back to the point of interface as a DS1⁸² level Digital signal. As a final

⁸¹ And Supra suspects alternatives 5 and 6.

⁸² Or higher.

1 output step, BellSouth then crossconnect the DS1 signal to an ancient D4 channel bank system

2 ⁸³which:

- 3 a) Further degrades the high speed modem capability of the line
- 4 b) Creates a requirement for connect and test activities and costs which can be
- 5 completely eliminated otherwise⁸⁴.
- 6 c) Ignores the more efficient and forward looking method of providing the DS1
- 7 level signal directly to the CLEC at a Connecting Facility Assignment
- 8 ("CFA") location, instead of taking it to the channel bank.
- 9 d) Is unnecessary and wasteful.

10 Supra does not want the added cost and complexity, coupled with the signal degradation
11 caused by bringing these "loops" to the MDF through a channel bank, when it can simply
12 connect at the point where the DS1 is connected to the channel bank, and enjoy a digital
13 facility interface instead. The most efficient method, the cheapest and least labor prone
14 approach is to present these loops at a Bellsouth CFA, to which the CLEC will have to order
15 transport facilities back to its switch using co-carrier crossconnect, unbundled transport, or a
16 CAP provider's transport. BellSouth offers no rational, defense or justification for its
17 unilateral decision to re-convert the loops back to two wire, and suffer all the
18 CONNECT&TEST handling charges instead of effecting a purely digital switch, without
19 human intervention via the OSS.

⁸³ A system which converts 2 wire (FXS/FXO) service to a channel in a DS1 circuit, and vice versa. This is accomplished by sampling and digitizing, albeit at a lower frequency than what is necessary to support high speed modem traffic.

⁸⁴ Ainsworth Sept. 21, 2004 depo. Tr., pg. 125-26

1 Bellsouth should not be allowed to degrade the signal and increase the cost in this manner
2 and Alternative 2, 4 (and 5 and 6 if applicable) must be offered with a DS1 POI to the CLEC
3 in lieu of (or in addition to) the 2 wire output of the channel bank. The non recurring cost
4 should and shall reflect this more efficient and forward looking approach, as previously
5 ordered by this Commission in PSC-01-1181-FOF-TP.

6
7 **Q. DOES IT AUTOMATICALLY FOLLOW THAT A CONVERSION OF UNE-P TO**
8 **UNE-L WITH THE UNE-P LOOP SERVED BY IDLC (OR INA) WILL**
9 **NECESSARY HAVE TO EXCEED THE NRC FOR A LOOP SERVED BY**
10 **COPPER OR UDLC?**

11 A. Not at all. In fact, that only comes to pass if the loop is completely reconstructed from
12 scratch; something we have already proven is an unnecessary violation of a Supreme Court order
13 against unnecessary disconnection of already connected elements. Yet it remains BellSouth's
14 predominant method of conversion today. If BellSouth is compelled to do Group 3 – INA,
15 Group 4 NGDLC, and Group 5 – Switch sidedoor conversions with the point of interface ("PI")
16 at a DS1 level, instead of degrading and unnecessarily raising the cost, the Group 3, 4, and 5 cost
17 studies show that the process is untouched by human hands, unencumbered by human labor rates
18 and worktimes and the entire conversion, up to the DS1 POI⁸⁵ will cost nothing more than the
19 OSS change charge of **10.2 cents**. (See Supra Exhibit # DAN-47 *Confidential* - Supra Group 3
20 Cost Study – NGDLC UNE-P to NGDLC Virtual Terminal UNE-L Cost Study FL-2w.xls.
21 Dated 10/08/2004, Supra Exhibit # DAN-48 *Confidential* - Supra Group 4 Cost Study – INA or

⁸⁵ At which point the CLEC will have to have purchased other facilities at existing rates.

1 other DCS served IDLC UNE-P to UNE-L Cost Study FL-2w.xls. (Similar to Group 3 Supra
2 Exhibit # DAN-47) Dated 10/08/2004 and Supra Exhibit # DAN-49 *Confidential* - Supra Group
3 5 Cost Study -IDLC UNE-P to Switch Side Dorr UNE-L Cost Study FL-2w.xls. (Similar to
4 Group 3 Supra Exhibit # DAN-47) Dated 10/08/2004)

5 **On the other hand**, if BellSouth is allowed to continue funneling such loops through
6 the D4 channel bank process it is quite likely that such loops will never be converted to UNE-L.
7 No carrier can simultaneously withstand the high NRC that would result on this increasing
8 segment of the loops, and keep the customer happy long enough to re-coup their investment.
9 Dial-up Internet users, provisioned via this method on Supra's switch, have left Supra by the
10 thousands.

11 That is the main reason Bellsouth chooses not to do this to their **own** retail customers.

12

13 **Q. SHOULD THE COMMISSION ESTABLISH A NEW RATE FOR THE UNE-P TO**
14 **UNE-L HOTCUT, FOR UNE-P LOOPS SERVED BY A) IDLC THAT IS IN A**
15 **CAPABLE, B) NGDLC, OR C) SWITCH SIDE-DOOR WITH A DS1 CLEC POI**
16 **INSTEAD OF THE D4 CHANNEL BANK POI AT THE MDF, WHAT RATE**
17 **WILL THAT BE?**

18 A. The electronic OSS change charge of \$0.102, unless Bellsouth provides sufficient
19 evidence regarding its network limitations which might serve to raise this cost / rate.

20

21

- 1 **Q. SHOULD THE COMMISSION ESTABLISH A NEW BLENDED RATE FOR THE**
2 **UNE-P TO UNE-L HOTCUT, FOR ALL UNE-P LOOPS SERVED BY IDLC**
3 **PRIOR TO CONVERSION WHAT RATE WILL THAT BE?**
- 4 **A. See Table 7 – Statewide weighted average of the various loop service**

				% deploy	% INA	Group	Rate	Statewide weighted
Copper				53.46%		1	\$7.54	\$4.03
IDLC - Not NGDLC Capable				19.70%	75%			
IDLC - Not NGDLC Capable - INA capable					14.8%	3	\$0.10	\$0.02
IDLC - Not NGDLC Capable, Not INA capable					4.9%	2	\$59.63	\$2.94
IDLC - NGDLC Capable				18.23%		4	\$0.10	\$0.02
UDLC - Not NGDLC				5.85%		1	\$7.54	\$0.44
UDLC - NGDLC Capable				2.75%		4	\$0.10	\$0.00
IDLC _ Switch Sde-door				0.00%		5	\$0.10	\$0.00
				100.00%				\$7.45

5 **Table 7 – Statewide weighted average of the various loop service methods**

- 6
- 7 **VI. The “COVAD” crossconnect is for construction of infrastructure and is being**
8 **improperly applied by BellSouth in a manner which allows BellSouth double**
9 **recovery of its cost(s).**

10

- 11 **Q. IN HER DIRECT TESTIMONY AT PAGE 8, LN. 21 MS. CALDWELL ASKS**
12 **THE QUESTION “ARE THERE ANY RATES ASSOCIATED WITH THE HOT-**
13 **CUT PROCESS CURRENTLY UNDER REVIEW BY THIS COMMISSION?”**
14 **WHAT SHOULD THIS COMMISSION TAKE AWAY FROM HER**
15 **TESTIMONY?**

- 16 **A. Absolutely nothing. While Supra does not dispute that collocation issues were addressed**
17 **in a separate Docket, the implication that something from the collocation docket is relevant to the**

1 non-recurring cost of a UNE-L loop is simply a fabrication which BellSouth's only other
2 witness, Mr. Ainsworth does not even support.
3 In his deposition, Mr. Ainsworth clearly testified that all of the worktimes for all of the work
4 activities that are performed by the Central Office Forces dept in actually performing the
5 crossconnect are recovered by the UNE-L loop cross study. Bellsouths continued billing of the
6 \$8.22 charge for the H.1.9 cross-connect is double recovery of cost, undue enrichment to
7 BellSouth and is a practice which must be terminated by this Commission immediately.

8

9 **Q. IS THERE ANY RELEVANCE TO THE COVAD DOCKET?**

10 A. No. It is a bald attempt to justify a BellSouth billing error, the genesis of which I
11 describe above. This entire issue should be rejected by the Commission, and BellSouth should
12 be ordered to immediately stop billing this charge in connection with a UNE-L loop.

13

14

15

1 **VII. Exhibits – Rebuttal Testimony.**

2 **VII.A. Issues 1 and 2 - Exhibits**

3 **Supra Exhibit # DAN-36** *Confidential* - BellSouth's UNEP to UNEL Bulk Migration

4 Process Flow, PFUNEP2L.ppt dated 6/6/2002

5 **Supra Exhibit # DAN-37** *Confidential* - BellSouths "Outside Plant Engineering

6 Methods and Procedures for Provisioning Network Elements"

7 document, Issue R, dated May 7, 2004 provided in response to

8 Supra's Second request for Production of Documents.

9 **Supra Exhibit # DAN-38** *Confidential (?????) - Composite* – Deposition

10 testimony(ies) of Daonne Caldwell

11 **Supra Exhibit # DAN-39** *Confidential (?????) - Partial Deposition Testimony of*

12 Kenneth Ainsworth

13 **VII.B. Issue 3 - Exhibits**

14 **Supra Exhibit # DAN-40** Direct testimony of David A. Nilson in Docket 990649-TP,

15 filed August 1, 2000.

16 **Supra Exhibit # DAN-41** Rebuttal testimony of David A. Nilson in Docket 990649-TP,

17 filed June 9, 2000.

18 **Supra Exhibit # DAN-42** Bellsouth response to Supra interrogatory 20-24 regarding lines

19 in service served via various loops service methods.

20 **Supra Exhibit # DAN-43** Supra modified version of Bellsouth response to Supra

21 interrogatory 20-24 (Supra Exhibit # DAN-42) with subtotals

22 calculating statewide percentage of various loops service

1 technologies, and making adjustment for the fact that
2 BellSouths NGDLC counts were also included in IDLC/UDLC
3 counts.

4 **Supra Exhibit # DAN-44** Supra high level analysis, showing the statewide weighted cost
5 of the various Supra cost study groups, weighted by the actual
6 network deployment data provided by BellSouth. Based upon
7 Supra Exhibit # DAN-42, Supra Exhibit # DAN-43, Supra
8 Exhibit # DAN-45, Supra Exhibit # DAN-46, Supra Exhibit #
9 DAN-47, Supra Exhibit # DAN-48, Supra Exhibit # DAN-49)

10 **Supra Exhibit # DAN-45** *Confidential* - Supra Group 1 Cost Study - Copper UDLC
11 UNE-P to UNE-L FL-2w.xls. Revised version of .Supra
12 Exhibit # DAN-9, Supra's A.1.1 and A.1.2 cost study for loops
13 served by Copper UDLC, includes disconnect and SL2 rates
14 not previously defined by .Supra Exhibit # DAN-9, which
15 should now be considered obsolete. Dated 10/08/2004

16 **VII.C. Issue 4 - Exhibits**

17 **Supra Exhibit # DAN-46** *Confidential* - Supra Group 2 Cost Study - IDLC served UNE-
18 P to Copper UDLC UNE-L Cost Study FL-2w.xls. Dated
19 10/08/2004

20 **Supra Exhibit # DAN-47** *Confidential* - Supra Group 3 Cost Study – NGDLC UNE-P to
21 NGDLC Virtual Terminal UNE-L Cost Study FL-2w.xls.
22 Dated 10/08/2004

1	Supra Exhibit # DAN-48	<i>Confidential</i> - Supra Group 4 Cost Study – INA or other DCS
2		served IDLC UNE-P to UNE-L Cost Study FL-2w.xls.
3		(Similar to Group 3 Supra Exhibit # DAN-47) Dated
4		10/08/2004
5	Supra Exhibit # DAN-49	<i>Confidential</i> - Supra Group 5 Cost Study –IDLC UNE-P to
6		Switch Side Dorr UNE-L Cost Study FL-2w.xls. (Similar to
7		Group 3 Supra Exhibit # DAN-47) Dated 10/08/2004
8	Supra Exhibit # DAN-50	<i>Confidential</i> -10-08-2004 – BellSouth WORST CASE NRC
9		cost study – Created by Supra from the October 8, 2001 A.1.1
10		and A.1.2 NRC cost study for loops served by Copper / UDLC
11		– Based upon elimination of avoided worksteps from the
12		October 8, 2001 FL-2w.xls cost study as agreed to by
13		BellSouth at the September 24, 2004 deposition of K.
14		Ainsworth. May yet contain excessive worktimes for times
15		not avoided, as discovery is not yet complete. This
16		document demonstrates BellSouths agreement that the \$9.57 is
17		closer to \$11.22, or less, based upon the deposition testimonies
18		in Supra Exhibit # DAN-38 and Supra Exhibit # DAN-39.
19	Supra Exhibit # DAN-51	11/22/2000 - BellSouth UNE-P Loop Concentration document
20		for CLECs “Unbundled Loop Concentration CLEC
21		Information Package”, Version 1

1 **VIII. Exhibits – Direct Testimony.**

- 2 **Supra Exhibit # DAN-1** Order PSC-01-1181-FOF-TP (Florida Public Service Commission)
3 Final Order in Florida Generic UNE Docket 990649-TP dated May
4 25, 2001. (electronic copy only)
- 5 **Supra Exhibit # DAN-2** Order PSC-01-2051-FOF-TP (Florida Public Service Commission)
6 Order on Reconsideration in Florida Generic UNE Docket 990649-
7 TP dated October 18, 2001. (electronic copy only)
- 8 **Supra Exhibit # DAN-3** Order PSC-02-1311-FOF-TP (Florida Public Service Commission)
9 Order Florida Generic UNE Docket 990649-TP dated September,
10 2002. (electronic copy only)
- 11 **Supra Exhibit # DAN-4** Order PSC-02-0413-FOF-TP (Florida Public Service Commission)
12 Order on Arbitration of Interconnection Agreement UNE Docket
13 001305-TP dated 3/26/2002. (electronic copy only)
- 14 **Supra Exhibit # DAN-5** \Supra – BellSouth Interconnection agreement dated July 15, 2002
15 (electronic copy only)
- 16 **Supra Exhibit # DAN-6** **Confidential (CD2)** - BellSouth August 16, 2000 cost study filing
17 in Docket 990649-TP. (electronic copy only)
- 18 **Supra Exhibit # DAN-7** **Confidential (CD-3)** – BellSouth October 8, 2001, Revision 1
19 Supplemental 120 Compliance filing Cost Study. (electronic copy
20 only)
- 21 **Supra Exhibit # DAN-8** **Confidential (CD4)** – BellSouth cost study from the Covad
22 Arbitration, Docket 001797-TP. (electronic copy only)

1 recurring charges above FPSC ordered rates, and making for the first
2 time, the claim that the FPSC order in 990649-TP was indeed
3 inclusive of a UNE-P to UNE- conversion.

4 **Supra Exhibit # DAN-16** 6/16/2003 Supra request to the FCC for consideration of Supra's
5 complaint for inclusion in the Accelerated Docket.

6 **Supra Exhibit # DAN-17** 6/18/2003 email A. Starr to C. Savage, Esq. of the FCC enforcement
7 division regarding BellSouth's failure to respond to the contractual
8 arguments raised in Supra's AD letter of 6/16/2003.

9 **Supra Exhibit # DAN-18** 6/18/2003 Supra supplement to the 6/1/62003 request for
10 consideration in response to the FCC 6/17/2003 request for
11 supplemental information.

12 **Supra Exhibit # DAN-19** \$59.31 UNE-L NRC rate – 6/23/2003 - Emergency Motion of
13 BellSouth Telecommunications, Inc. for Interim Relief Regarding
14 Obligation to Perform UNE-P to UNE-L Conversions. BellSouth's
15 motion for interim relief now includes an \$8.22 crossconnect charge
16 for the first time, along with an admission that the contract does not
17 specify a process.

18 **Supra Exhibit # DAN-20** 07/14/2004 Letter L. Foshee (BST) to A. Starr (FCC) in response to
19 Supra's request that its complaint against BellSouth (re: UNE-p to
20 UNE-L conversion costs) be included in the Accelerated Docket.

21 **Supra Exhibit # DAN-21** 7-15-2003 United State Bankruptcy Court order in Case 02-41250-

1 BKC-RAM, granting a temporary award to BellSouth of \$59.3186
2 after finding that the interconnection agreement did "... specifically
3 set a rate for UNE-P to UNE-L conversions..."not provide for this
4 rate, deferring judgment upon such a rate to the FCC or the FPSC.
5 **Supra Exhibit # DAN-22** 7/23/2003 Letter C. Savage, esq. to A. Starr (FCC) in response to
6 BellSouth's position(s) before the FCC.
7 **Supra Exhibit # DAN-23** Direct Testimony of Kenneth Ainsworth filed December 4, 2003 in
8 Docket 030851-TP.
9 **Supra Exhibit # DAN-24** Surebuttal Testimony of John A. Ruscilli filed January 28, 2004.
10 2003 in Docket 030851-TP.
11 **Supra Exhibit # DAN-25** BellSouth Spreadsheet file (filename BellSouth Network
12 Statistics.xls) available from
13 http://www.BellSouth.com/investor/xls/ir_businessprofile_statistics.xls
14 showing 65.8% of all loop feeder routes contain fiber in the
15 entire nine state region, and 70% of homes qualify for DSL. BST
16 Technology and Deployment Statistics
17 [ir_businessprofile_statistics.xls](http://www.BellSouth.com/investor/xls/ir_businessprofile_statistics.xls)
18 **Supra Exhibit # DAN-26** Excerpt from the Testimony of Kenneth Ainsworth filed December
19 4, 2003 in Docket 030851-TP at pg. 21.
20 **Supra Exhibit # DAN-27** 9-16-2003 BellSouth Document "Fiber Loops", author Peter Hill.
21 Presentation to the FPSC in Docket 030851-TP.

⁸⁶ Based upon BellSouth's belief that it would ultimately be receive authorization to charge that rate.

1 **Supra Exhibit # DAN-28** 5-5-2003 BellSouth Letter to AT&T (L. MacKenzie to D. Berger)
2 documenting IDLC penetration levels by state.
3 **Supra Exhibit # DAN-29** 4/18/00 Coordinated Hot Cut Process Flow (as defined by the parties
4 Interconnection agreement). Exhibit NDT-3 to Testimony in FPSC
5 Docket 001305-TP.
6 **Supra Exhibit # DAN-30** 8-15-2003 Supra UNE-P to UNE-L Conversion Process document.
7 **Supra Exhibit # DAN-31** BellSouth Provisioning Process Flow (Coordinated cuts), Exhibit
8 KLA-1 to the testimony of Kenneth Ainsworth in FPSC Docket
9 030851-TP.

1

2 **Supra Exhibit # DAN-32** 3-5-2003 high level BellSouth IDLC Document identifying the 8
3 methods by which BellSouth agrees to convert IDLC served UNE-P
4 lines to UNE-L

5 **Supra Exhibit # DAN-33** 3-26-03 BellSouth UNE-Port/Loop Combination (UNE-P) to UNE-
6 Loop (UNE-L) Bulk Migration – CLEC Information Package,
7 Version 1. BellSouth’s process documentation to CLECs for this
8 conversion.

9 **Supra Exhibit # DAN-34** 2-18-04 BellSouth UNE-Port/Loop Combination (UNE-P) to UNE-
10 Loop (UNE-L) Bulk Migration – CLEC Information Package,
11 Version 2. BellSouth’s process documentation to CLECs for this
12 conversion.

13 **Supra Exhibit # DAN-35** 7-26-04 BellSouth UNE-Port/Loop Combination (UNE-P) to UNE-
14 Loop (UNE-L) Bulk Migration – CLEC Information Package,
15 Version 3. BellSouth’s process documentation to CLECs for this
16 conversion.

17

18 **Q. Does this conclude your rebuttal testimony?**

19 **A.** Yes it does.

20

21

22 **Q. END OF TESTIMONY**

1 I, DAVID A. NILSON, am the Chief Technology Officer of Supra Telecommunications and
2 Information Systems Inc., and am authorized to make this Affidavit on behalf of said
3 corporation. The statements made in the foregoing comments are true of my own knowledge,
4 except as to those matters which are therein stated on information and belief, and as to those
5 matters I believe them to be true.

6

7 I declare under penalty of perjury that the foregoing is true and correct this 8th day of
8 October, 2004.

9

10

David Nilson

11

12 STATE OF FLORIDA)

13) SS:

14 COUNTY OF MIAMI-DADE)

15

16 The execution of the foregoing instrument was acknowledged before me this 8th day of October,
17 2004, by David Nilson, who [X] is personally known to me or who [] produced
18 _____ as identification and who did take an oath.

19

20 My Commission Expires:

21

NOTARY PUBLIC

22

State of Florida at Large

23

Print Name:

24